

25cr48 ECT/DTS

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

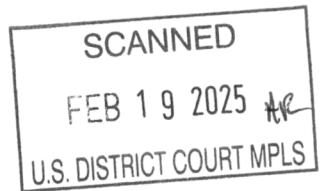
UNITED STATES OF AMERICA,        )  
                                      )  
                                      Plaintiff,        )        INDICTMENT  
                                      )  
                                      v.        )        18 U.S.C. § 1343  
                                      )  
THANH HA LAM,        )  
                                      )  
                                      Defendant.        )

THE GRAND JURY CHARGES THAT:

**COUNTS 1-8**  
(Wire Fraud)

1.     At times relevant to this Indictment:
  - a.     Stahl Construction was a general contactor located in Minneapolis, Minnesota.
  - b.     Defendant THANH HA LAM was employed as the Director of Operations of Stahl Construction.
  - c.     In her position as Director of Operations, Defendant LAM was responsible for managing and supervising a wide range of internal company operations, including human resources and project marketing.
2.     From in or about January 2018 through in or about May 2024, in the State and District of Minnesota, and elsewhere, the defendant,

**THANH HA LAM,**



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did knowingly devise and participate in a scheme and artifice to defraud and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts.

3. Defendant LAM used her position as Director of Operations to embezzle more than \$550,000 from Stahl Construction over a six-and-a-half-year period. As part of the scheme, Defendant LAM made unauthorized personal transactions using Stahl Construction credit cards, including luxury travel, premium event tickets, and her children's education and wedding expenses.

4. It was further part of the scheme that Defendant LAM attempted to conceal her embezzlement by altering credit card statements and creating false entries in Stahl Construction's accounting records to make it look like the unauthorized personal transactions were for legitimate business expenses.

5. It was further part of the scheme that Defendant LAM altered Stahl Construction's payroll records to fraudulently increase her annual salary and to fraudulently pay herself unauthorized bonuses.

6. On or about the dates listed below, in the State and District of Minnesota and elsewhere, the defendant,

**THANH HA LAM,**

for the purpose of executing the scheme described above, knowingly caused to be transmitted by means of a wire communication in interstate commerce, all of which passed through servers outside the State of Minnesota, certain writings, signs, signals, and sounds, as follows:

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Count	Date (on or about)	Wire Details
1	March 12, 2021	A credit card transaction purchasing approximately \$6,781 worth of goods and services from Apple Vacations LLC.
2	June 11, 2021	A credit card transaction purchasing approximately \$1,816 worth of goods and services from Apple Vacations LLC.
3	June 11, 2021	A credit card transaction purchasing approximately \$4,876 worth of goods and services from Apple Vacations LLC.
4	February 21, 2022	A credit card transaction purchasing approximately \$7,811 worth of goods and services from Apple Vacations LLC.
5	March 7, 2022	A credit card transaction purchasing approximately \$5,000 worth of goods and services from Andiamo Restaurant.
6	September 20, 2022	A credit card transaction purchasing approximately \$5,000 worth of goods and services from Andiamo Restaurant.
7	October 12, 2022	A credit card transaction purchasing approximately \$5,000 worth of goods and services from Andiamo Restaurant.
8	October 20, 2022	A credit card transaction purchasing approximately \$6,256 worth of goods and services from Andiamo Restaurant.

All in violation of Title 18, United States Code, Section 1343.

### **FORFEITURE ALLEGATIONS**

7. Counts 1-8 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), in conjunction with Title 28, United States Code, Section 2461(c).

8. As the result of the offenses alleged in Counts 1-8 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code,

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Section 981(a)(1)(C), in conjunction with Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to such violations.

9. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p) and by Title 28, United States Code, Section 2461(c).

A TRUE BILL

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ACTING UNITED STATES ATTORNEY

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FOREPERSON